

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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*Counsel for Ad Hoc Group of Customers of Powin, LLC*

In re:

Powin, LLC, *et al.*,<sup>1</sup>

Debtors.

Case No. 25 – 16137 (MBK)

Chapter 11

(Jointly Administered)

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin, LLC [0504], (ii) PEOS Holdings, LLC [5476], (iii) Powin Project LLC [1583], (iv) Powin China Holdings 1, LLC [1422], (v) Powin China Holdings 2, LLC [9713], (vi) Charger Holdings, LLC [5241], (vii) Powin Energy Ontario Storage, LLC [8348], (viii) Powin Energy Operating Holdings, LLC [2495], (ix) Powin Energy Operating, LLC [6487]. The Debtors' mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.

**AD HOC CUSTOMER GROUP  
WITNESS AND EXHIBIT LIST FOR HEARING  
SCHEDULED FOR JULY 15, 2025 AT 11:30 A.M. (ET)**

Lone Star Solar, LLC,<sup>2</sup> Idaho Power Company, West Warwick Energy Storage 1, LLC, West Warwick Energy Storage 2, LLC, and West Warwick Energy Storage 3, LLC<sup>3</sup> (each a “**Customer**,” and collectively, the “**Ad Hoc Customer Group**”), file this Witness and Exhibit List regarding the hearing scheduled for July 15, 2025 at 11:30 a.m. (ET) (the “**Hearing**”).

**WITNESS**

The Ad Hoc Customer Group may call any of the following witnesses at the Hearing:

1. **Ann Walter, SVP of Asset Management at energyRe, LLC:** Ms. Walter may testify live (in person or by remote testimony) and/or give testimony necessary to seek admission of the *Declaration of Ann Walter in Support of Emergency Motion of Ad Hoc Customer Group for Entry of an Order (I) Granting Adequate Protection Under Section 363(e) of the Bankruptcy Code and (II) Granting Related Relief* [Docket No. 343] and as otherwise may be necessary and appropriate in connection with the Hearing.
2. **Tyler Hansen, Stations Engineering and Reliability Senior Manager of Idaho Power Company:** Mr. Hansen may testify live (in person or by remote testimony) and/or give testimony necessary to seek admission of the *Declaration of Tyler Hansen in Support of Emergency Motion of Ad Hoc Customer Group for Entry of an Order (I) Granting Adequate Protection Under Section 363(e) of the Bankruptcy*

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<sup>2</sup> Lone Star Solar, LLC is a subsidiary of energyRe, LLC.

<sup>3</sup> West Warwick Energy Storage 1, LLC, West Warwick Energy Storage 2, LLC, and West Warwick Energy Storage 3, LLC are direct subsidiaries of Convergent West Warwick, LLC and indirect subsidiaries of Convergent Energy and Power LP.

*Code and (II) Granting Related Relief* [Docket No. 346] and as otherwise may be necessary and appropriate in connection with the Hearing.

3. **Tim Reaves, Managing Vice President, Network & Control Center Operations of Convergent Energy and Power LP:** Mr. Reaves may testify live (in person or by remote testimony) and/or give testimony necessary to seek admission of the *Declaration of Tim Reaves in Support of Emergency Motion of Ad Hoc Customer Group for Entry of an Order (I) Granting Adequate Protection Under Section 363(e) of the Bankruptcy Code and (II) Granting Related Relief* [Docket No. 348] and as otherwise may be necessary and appropriate in connection with the Hearing.
4. Any witness called or listed by an other party; and
5. Any rebuttal witnesses.

The Ad Hoc Customer Group reserves the right to supplement or amend this witness list and to identify additional witnesses prior to the conclusion of the Hearing.

#### **EXHIBITS**<sup>4</sup>

The Ad Hoc Customer Group may offer into evidence any one or more of the following exhibits:<sup>5</sup>

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<sup>4</sup> Voluminous exhibits to certain contracts listed herein (the “*Voluminous Exhibits*”) are not attached to the contracts. The Voluminous Exhibits can be made available to the extent they are relevant.

<sup>5</sup> Exhibits 6 through 34 are subject to the *Motion for Entry of an Order Authorizing Ad Hoc Customer Group to Redact and File Under Seal Confidential Information Contained in Exhibits in Connection with Ad Hoc Customer Group’s Declarations and Witness and Exhibit List* [Docket No. 339] or have been otherwise designated confidential by the Ad Hoc Customer Group. Inclusion of a confidential exhibit herein does not waive any confidential treatment of such exhibit.

EXHIBIT	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE	DISPOSITION
1.	Emergency Motion of Ad Hoc Customer Group for Entry of an Order (I) Granting Adequate Protection Under Section 363(e) of the Bankruptcy Code and (II) Granting Related Relief [Docket No. 297]					
2.	Limited Objection and Reservation of Rights of Ad Hoc Customer Group to Omnibus Motion of the Debtors for Entry of an Order (I) Authorizing the Rejection of Legacy Customer Contracts and (II) Granting Related Relief [Docket No. 296]					
3.	Declaration of Ann Walter in Support of Emergency Motion of Ad Hoc Customer Group for Entry of an Order (I) Granting Adequate Protection Under Section 363(e) of the Bankruptcy Code and (II) Granting Related Relief [Docket No. 343]					
4.	Declaration of Tyler Hansen in Support of Emergency Motion of Ad Hoc Customer Group for Entry of an Order (I) Granting Adequate Protection Under Section 363(e) of the Bankruptcy Code and (II) Granting Related Relief [Docket No. 346]					
5.	Declaration of Tim Reaves in Support of Emergency Motion of Ad Hoc Customer Group for Entry of an Order (I) Granting Adequate Protection Under Section 363(e) of the Bankruptcy Code and (II) Granting Related Relief [Docket No. 348]					
6.	Amended and Restated Energy Supply Agreement between Lone Star Solar, LLC and Powin LLC dated as of September 15, 2023					
7.	Long Term Services Agreement between Lone Star Solar, LLC and Powin, LLC dated as of May 1, 2024					
8.	Battery Energy Supply Agreement between Idaho Power Company and Powin, LLC (Black Mesa Project) dated as of February 28, 2022					
9.	Battery Energy Supply Agreement between Idaho Power Company and Powin, LLC (Elmore Project) dated as of December 28, 2021					

<b>EXHIBIT</b>	<b>DESCRIPTION</b>	<b>OFFERED</b>	<b>OBJECTION</b>	<b>ADMITTED</b>	<b>DATE</b>	<b>DISPOSITION</b>
10.	Battery Energy Supply Agreement between Idaho Power Company and Powin, LLC (Filer Project) dated as of December 28, 2021					
11.	Battery Energy Supply Agreement between Idaho Power Company and Powin, LLC (Hemingway Project) dated as of February 28, 2022					
12.	Battery Energy Supply Agreement between Idaho Power Company and Powin, LLC (Melba Project) dated as of December 28, 2021					
13.	Battery Energy Supply Agreement between Idaho Power Company and Powin, LLC (Weiser Project) dated December 28, 2021					
14.	Energy Supply Agreement between Idaho Power Company and Powin, LLC dated as of June 8, 2023					
15.	Long Term Services Agreement between Idaho Power Company and Powin, LLC dated as of August 21, 2023					
16.	Change Order between Idaho Power Company and Powin, LLC dated as of June 13, 2022					
17.	Change Order between Idaho Power Company and Powin, LLC dated as of September 14, 2023					
18.	Omnibus Change Order between Idaho Power Company and Powin, LLC dated as of May 2, 2023					
19.	Second Omnibus Change Order between Idaho Power Company and Powin, LLC dated as of March 11, 2025					
20.	IP Escrow Invoicing Agreement entered into as of September 14, 2023 by and between Idaho Power Company and Powin, LLC					
21.	Signature Beneficiary Enrollment Form between Praxis Technology Escrow, LLC, Powin, LLC, and Idaho Power Company dated as of September 14, 2023					
22.	Battery Energy Supply Agreement between West Warwick Energy Storage 1 LLC and Powin, LLC dated as of February 16, 2022					

<b>EXHIBIT</b>	<b>DESCRIPTION</b>	<b>OFFERED</b>	<b>OBJECTION</b>	<b>ADMITTED</b>	<b>DATE</b>	<b>DISPOSITION</b>
23.	Battery Energy Supply Agreement between West Warwick Energy Storage 2 LLC and Powin, LLC dated as of February 16, 2022					
24.	Battery Energy Supply Agreement between West Warwick Energy Storage 3 LLC and Powin, LLC dated as of February 16, 2022					
25.	Long Term Services Agreement between West Warwick Energy Storage 1 LLC and Powin, LLC dated as of July 12, 2024					
26.	Long Term Services Agreement between West Warwick Energy Storage 2 LLC and Powin, LLC dated as of September 26, 2024					
27.	Long Term Services Agreement between West Warwick Energy Storage 3 LLC and Powin, LLC dated as of September 26, 2024					
28.	Change Order #001 between West Warwick Energy Storage 2 LLC and Powin, LLC dated as of September 25, 2023					
29.	Change Order #002 between West Warwick Energy Storage 2 LLC and Powin, LLC dated as of May 17, 2024					
30.	Change Order #001 between West Warwick Energy Storage 3 LLC and Powin, LLC dated as of January 19, 2024					
31.	Change Order #002 between West Warwick Energy Storage 3 LLC and Powin, LLC dated as of May 17, 2024					
32.	Signature Beneficiary Enrollment Form between Praxis Technology Escrow, LLC, Powin, LLC, and West Warwick Energy Storage I, LLC					
33.	Signature Beneficiary Enrollment Form between Praxis Technology Escrow, LLC, Powin, LLC, and West Warwick Energy Storage II, LLC					

<b>EXHIBIT</b>	<b>DESCRIPTION</b>	<b>OFFERED</b>	<b>OBJECTION</b>	<b>ADMITTED</b>	<b>DATE</b>	<b>DISPOSITION</b>
34.	Signature Beneficiary Enrollment Form between Praxis Technology Escrow, LLC, Powin, LLC, and West Warwick Energy Storage III, LLC					
	Any pleading or other document filed with the Court on the docket of the above-captioned chapter 11 cases					
	Any exhibit necessary to rebut the evidence or testimony of any witness offered or designated by any other party					
	Any exhibit listed or offered by any other party					

The Ad Hoc Customer Group reserves its right to amend or supplement this Witness and Exhibit List at any time prior to the Hearing. The Ad Hoc Customer Group also reserves the right to use testimony and/or documents offered into evidence by other parties. The Ad Hoc Customer Group reserves the right to offer into evidence any other exhibit designated by any other party in connection with the hearing on these matters. The Ad Hoc Customer Group further reserves the right to offer into evidence such additional testimony and documents as may be appropriate for rebuttal or impeachment purposes.

*[Remainder of page intentionally left blank.]*

Dated: July 11, 2025

New York, NY

/s/ Steven M. Abramowitz

**VINSON & ELKINS LLP**

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*Counsel for Ad Hoc Group of  
Customers of Powin, LLC*



**CERTIFICATE OF SERVICE**

I, Steven M. Abramowitz, hereby certify that on the 11th day of July, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the District of New Jersey on those parties registered to receive electronic notices.

/s/ Steven M. Abramowitz

Steven M. Abramowitz